

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Case:2:22-cr-20592
Judge: Hood, Denise Page
MJ: Patti, Anthony P.
Filed: 11-09-2022 At 04:43 PM
IND USA V. SEALED MATTER (DA)

Violations: 18 U.S.C. § 1349
18 U.S.C. § 1344(2)

D-1 Kevin Jones,
D-2 Flint Curney
D-3 John Randazzo
D-4 Feraud Curney
D-5 Filan Curney
D-6 Ferris Curney
D-7 Melody Leggett
D-8 Katana Jackson

Defendants.

/

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

The Defendants

At all times relevant to this Indictment:

1. D-1 Kevin Jones was a resident of Wayne County within the Eastern District of Michigan.

2. D-2 Flint Curney was a resident of Wayne County within the Eastern District of Michigan.
3. D-3 John Randazzo was a resident of Macomb County within the Eastern District of Michigan.
4. D-4 Feraud Curney was a resident of Wayne County within the Eastern District of Michigan.
5. D-5 Filan Curney was a resident of Wayne County within the Eastern District of Michigan.
6. D-6 Ferris Curney was a resident of Oakland County within the Eastern District of Michigan.
7. D-7 Melody Leggett was a resident of Oakland County within the Eastern District of Michigan.
8. D-8 Katana Jackson was a resident of Wayne County within the Eastern District of Michigan.

The Financial Institutions

At all times relevant to this Indictment:

9. Financial Institution A was a financial institution based in Cincinnati, Ohio that was insured by the FDIC; thus, it is a “financial institution” as defined in 18 U.S.C. § 20(1).

10. Financial Institution B was a financial institution based in Troy, Michigan that was insured by the FDIC; thus, it is a “financial institution” as defined in 18 U.S.C. § 20(1).

COUNT 1

(Bank Fraud Conspiracy – 18 U.S.C. § 1349)

D-1 Kevin Jones
D-2 Flent Curney
D-3 John Randazzo
D-4 Feraud Curney
D-5 Filan Curney
D-6 Ferris Curney

11. Paragraphs 1 – 10 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

12. From in or around June 2021 through in or around July 2022, in the Eastern District of Michigan, and elsewhere, the Defendants D-1 Kevin Jones, D-2 Flent Curney, D-3 John Randazzo, D-4 Feraud Curney, D-5 Filan Curney, and D-6 Ferris Curney, and other co-conspirators not named as defendants herein, knowingly agreed to execute, and attempt to execute, a scheme to defraud various federally insured financial institutions to obtain the money, funds credits, assets, securities, or other property owned by, or under the custody or control

of, the financial institutions, by means of false or fraudulent pretenses, representations, or promises.

13. It was part of the scheme that the Defendants (1) obtained stolen mail from legitimate businesses (“Victim Businesses”), (2) incorporated businesses with similar—but not identical—names to the Victim Businesses (“Cloned Businesses”), (3) opened bank accounts at various financial institutions in the names of the Cloned Businesses (“Cloned Accounts”), (4) deposited the checks intended for the Victim Businesses into the Cloned Accounts, and (5) depleted the funds from the Cloned Accounts by either withdrawing funds in cash, obtaining a cashier’s check from the Cloned Accounts, or making debit card purchases using funds in the Cloned Accounts.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2 - 7

(Bank Fraud - 18 U.S.C. § 1344(2))

**D-1 Kevin Jones
D-2 Flint Curney
D-3 John Randazzo
D-4 Feraud Curney
D-6 Ferris Curney
D-7 Melody Leggett
D-8 Katana Jackson**

14. Paragraphs 1 – 13 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

15. On or about the dates set forth below, in the Eastern District of Michigan, and elsewhere, D-1 Kevin Jones, D-2 Flint Curney, D-3 John Randazzo, D-4 Feraud Curney, D-5 Filan Curney, D-6 Ferris Curney, D-7 Melody Leggett, and D-8 Katana Jackson, aided and abetted by others, and aiding and abetting others known and unknown to the Grand Jury, knowingly executed and/or attempted to execute a scheme or artifice to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a federally insured financial institution, by means of false or fraudulent pretenses, representations, or promises, with each execution set forth below forming a separate count:

Count	Defendants	Victim Business	Financial Institution	Approximate Dates & Amounts of Deposits	Approximate Dates & Amounts of Withdrawals
Count 2	D-2 Flent Curney	Victim Business 1	Financial Institution A	6/16/2021 – \$9,628	6/18/2021 – \$4,000
Count 3	D-1 Kevin Jones D-2 Flent Curney	Victim Business 1	Financial Institution B	8/2/2021 – \$10,800 8/5/2021 – \$17,750	8/10/2021 – \$9,380
Count 4	D-3 John Randazzo	Victim Business 2	Financial Institution B	1/15/2022 – \$14,724	1/21/2022 – \$8,577
Count 5	D-6 Ferris Curney	Victim Business 3	Financial Institution B	7/5/2022 – \$11,616	7/6/2022 – \$3,000
Count 6	D-6 Ferris Curney D-7 Melody Leggett	Victim Business 4	Financial Institution A	7/14/2022 – \$10,135	8/2/2022 – \$5,000

Count 7	D-8 Katana Jackson	Victim Business 5	Financial Institution B	6/24/2022 – \$20,420	6/24/2022 – \$6,000
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Each in violation of 18 U.S.C. § 1344(2).

FORFEITURE ALLEGATIONS

16. The allegations contained in Counts One through Seven of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2).

17. Upon conviction of the offense(s) charged in Counts One through Seven of this Indictment in violation of Title 18, United States Code, Section 1344(2), defendant shall forfeit to the United States any property which constitutes or is derived from proceeds obtained directly or indirectly as the result of such violation, pursuant to Title 18, United States Code, Section 982(a)(2).

18. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- (a) Cannot be located upon the exercise of due diligence;

- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461, to seek to forfeit any other property of defendant up to the value of the forfeitable property described above.

19. Money Judgment: Upon conviction of violating Title 18, United States Code, Section 1344, defendant shall be ordered to pay the United States a sum of money equal to the total amount of proceeds defendant obtained as a result of such violation(s).

THIS IS A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ Brandy R. McMillion
BRANDY R. McMILLION
Chief, General Crimes Unit
Assistant United States Attorney

s/ Erin L. Ramamurthy
ERIN L. RAMAMURTHY
Assistant United States Attorney

Dated: November 9, 2022

United States District Court
Eastern District of Michigan

Criminal Case C

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to

	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>ELR</u>

Case Title: USA v. Kevin Jones, et al. (see attached list)

County where offense occurred : Wayne and elsewhere

Check One: **Felony** **Misdemeanor** **Petty**

- Indictment/____ Information --- no prior complaint.
 Indictment/____ Information --- based upon prior complaint [Case number: _____]
 Indictment/____ Information --- based upon LCrR 57.10 (d) [*Complete Superseding section below*].

Superseding to Case No: _____

Judge: _____

- Corrects errors; no additional charges or defendants.
 Involves, for plea purposes, different charges or adds counts.
 Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 9, 2022
Date

Erin L. Ramamurthy
Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.

Attachment to Criminal Cover Sheet

D-1 Kevin Jones,
D-2 Flent Curney
D-3 John Randazzo
D-4 Feraud Curney
D-5 Filan Curney
D-6 Ferris Curney
D-7 Melody Leggett
D-8 Katana Jackson

Defendants